UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOEL RICH and MARY RICH,   :   Civil Action No. 1:18-cv-02223
                                                                 :   (GBD)(SN)
                                   Plaintiffs,   :
                                                                 :
                    v.   :
                                                                 :
FOX NEWS NETWORK, LLC, MALIA   :
ZIMMERMAN in her individual and professional :
capacities, and ED BUTOWSKY, in his individual :
and professional capacities,   :
                                                                 :
                                   Defendants.   :
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DECLARATION OF ELI J. KAY-OLIPHANT IN SUPPORT OF
PLAINTIFFS' MOTION TO SEAL

I, Eli J. Kay-Oliphant, hereby declare as follows:

1.   I am a partner at the law firm of Massey & Gail LLP, counsel of record for

Plaintiffs Mary Rich and Joel Rich. I have personal knowledge of the facts set forth in this

declaration and make this declaration in support of Plaintiffs' Motion to Seal.

2.   Exhibit 2, attached to the Declaration of Eli J. Kay-Oliphant, and filed in support

of Plaintiffs' Opposition to Fox News Network, LLC's and Malia Zimmerman's Second Motion

to Dismiss, was designated confidential in *Rich v. Butowsky, et al.*, 18-cv-681-RJL (D.D.C.).

3.   Exhibit 3, attached to the Declaration of Eli J. Kay-Oliphant, and filed in support

of Plaintiffs' Opposition to Fox News Network, LLC's and Malia Zimmerman's Second Motion

to Dismiss, was designated confidential in this matter.

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4.   Exhibit 4, attached to the Declaration of Eli J. Kay-Oliphant, and filed in support of Plaintiffs' Opposition to Fox News Network, LLC's and Malia Zimmerman's Second Motion to Dismiss, was designated confidential in this matter.

I declare under the penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 28th Day of February, 2020

/s/ Eli J. Kay-Oliphant
Eli J. Kay-Oliphant

CERTIFICATE OF SERVICE

I hereby certify this 28th day of February, 2020 that I caused a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification to the attorneys of record.

s/ Eli J. Kay-Oliphant
Eli J. Kay-Oliphant